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January 23, 2003
TN REGULATORY AUTHORITY
DOCKET ROOM

SEND BY AIR EXPRESS

Chairman Sara Kyle
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 02-00438: *Complaint of Aeneas against Citizens*
Sprint Response to Aeneas Discovery

Dear Chairman Kyle:

Enclosed for filing in the above case is the Response of United Telephone-Southeast, Inc. and Sprint Communications Company L.P. to the First Set of Discovery Requests dated January 20, 2003 from Aeneas Communications. A copy of the Response is being served on counsel of record.

Please contact me if you have any questions.

Sincerely,

James B. Wright w/perm KBO
James B. Wright

Enclosures

C: Jon Wike (w/encl)
Counsel of Record (w/encl)
Laura Sykora
Kaye Odum

CERTIFICATE OF SERVICE
Aeneas Complaint (Docket No. 02-00438)

The undersigned certifies that the foregoing Sprint Response to Aeneas' Discovery was served upon the following parties of record by hand-delivery, by fax or by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

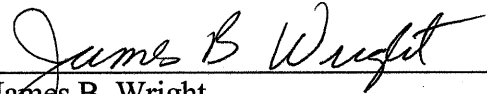
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Dated: January 23, 2003



James B. Wright

TENNESSEE REGULATORY AUTHORITY, DOCKET NO. 02-00438
FIRST SET OF DISCOVERY REQUESTS FROM AENEAS COMMUNICATIONS TO
UNITED TELEPHONE-SOUTHEAST, INC. AND
SPRINT COMMUNICATIONS COMPANY L.P. DATED JANUARY 20, 2003

1. Based on the circumstances set forth in the February 11, 2001, memorandum from TRA staffer Lewis DeBoard (copy attached), please explain Sprint United's position concerning the proper routing of calls from an end user located in Weakly County served by Citizens Communications (Citizens) to an end user also located in Weakly County but who is in the service area of BellSouth Telecommunications, Inc. "BellSouth" and receives service from Aeneas. Does Sprint United believe that Citizens should route such traffic to a BellSouth tandem or to a BellSouth end office?

Response:

Sprint acknowledges that it may not be privy to all the particular details of the controversy between the two parties, but it appears that the controversy is raising issues concerning indirect versus direct interconnections and transit service provided at tandems and end offices. The Tennessee Regulatory Authority could issue a precedent setting ruling regarding these issues that affects Sprint's diverse business interests in Tennessee. Thus, Sprint has chosen to intervene in this proceeding in order to provide its position on these important issues and monitor the course of the docket.

Sprint Corporation supports carriers' ability to interconnect either directly or indirectly with other carriers depending on the volumes of traffic being exchanged between the ultimate originating and terminating parties. It is both uneconomic and inefficient from a network perspective to require a CLEC or CMRS provider to directly interconnect with every ILEC (and every other CLEC and CMRS carrier) in a LATA when volumes of traffic do not economically justify direct connections. Therefore, allowing carriers to indirectly interconnect is essential to the development of a competitive marketplace. This position is clearly supported by the Telecommunications Act as well as FCC rules. Section 251(a)(1) of the 1996 Telecommunications Act specifically requires all carriers "to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers." Moreover, the FCC has affirmed the need for indirect interconnection under the Act, stating that indirect interconnection provides an economic alternative for carriers that do not have market power.¹

It is not possible for carriers to indirectly interconnect without a third party transit provider. Therefore, Sprint firmly believes that ILECs should be required to perform transiting functions for indirectly interconnected carriers at their tandem, not their end office, for small volumes of traffic. It is not appropriate to require carriers to perform a tandem function at an end office switch. Moreover, Sprint believes that the originating carrier and the terminating carrier delivering traffic via a tandem should establish an indirect agreement to address inter-carrier compensation issues.

¹ See *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers*: FCC No. 96-325, 11 FCC Rcd 15499; 1996 FCC LEXIS 4312 at ¶ 997. (rel. Aug. 1, 1996) (the FCC's "Local Competition Order")

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Response to Question 1 (Continued):

Sprint recognizes that once volumes of traffic exceed a certain level, it is more efficient and cost effective to establish a direct connection. This will avoid exhausting the transit provider's tandem and avoid incurring transit charges from the tandem provider. When volumes of traffic are small, however, there is very little incremental burden imposed on the tandem and a direct connection is economically impractical. Furthermore, Sprint's position is that the tandem provider should be compensated at TELRIC-based rates for providing this transit service.

TENNESSEE REGULATORY AUTHORITY, DOCKET NO. 02-00438
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2. Does Sprint United believe that the Local Exchange Routing Guide ("LERG") directly or indirectly address the issues raised in Question 1? If so, please identify the relevant portions of the LERG, explain how these portions address the issues, and provide a copy of any relevant language from the LERG.

Response:

The LERG is a database created and maintained by Telcordia Technologies. The database identifies routing of interLATA calls by interexchange carriers and provides information to companies about the network, numbering and numerous other subjects. For more information see www.trainfo.com/products_services/tra/catalog_details.html.

Sprint believes the principles and policies set out in its Response to Question 1 most directly address the issues identified. As specifically stated, Sprint does not believe it is appropriate to require carriers to perform tandem functions at an end office switch. Where a carrier has entered routing information in the LERG, Sprint believes it is industry practice that other carriers follow the routing guidance provided.

Sprint subscribes to the LERG pursuant to a contract with Telcordia Technologies. The "General Information" included with the LERG, as well as the LERG search and output formats are subject to copyright protection and cannot be released without written permission of Telcordia Technologies.

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3. Identify and provide any other source of information or policy consideration relied upon by Sprint-United in responding to Question 1.

Response:

All sources Sprint relied upon in answering Question 1 are included therein.